

EXHIBIT M

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4

5 CASE NUMBER: 1:21-CV-05337-SCJ
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7 ALPHA PHI ALPHA FRATERNITY INC., a nonprofit
8 organization on behalf of members residing in
9 Georgia; SIXTH DISTRICT OF THE AFRICAN
10 METHODIST EPISCOPAL CHURCH, a Georgia
11 Nonprofit organization; ERIC T. WOODS; KATIE
12 BAILEY GLENN; PHIL BROWN; JANICE STEWART,
13 PLAINTIFFS,
14

15 V.
16

17 BRAD RAFFENSPERGER, in his official capacity
18 as Secretary of State of Georgia,
19 DEFENDANT.
20

21 DEPOSITION TESTIMONY OF:

22 Eric Woods

23 December 15, 2022

1 Q. And similar to that, do you know how
2 many black people have been elected to public
3 office in Georgia?

4 A. No, I do not.

5 Q. Looks like we're almost finishing
6 up, and I'm just broadly asking this
7 question.

8 Are you aware of any needs of the
9 minor community in Georgia that, in your
10 opinion, differ from those of white
11 residents?

12 A. Absolutely.

13 Q. And what would you describe those
14 as?

15 A. Where do you want me to start?
16 Health care?

17 Q. Anywhere you want.

18 A. You know, I'll just -- I'll just go
19 with health care, access to, education,
20 and -- health care, education, access to,
21 I'll say, food distribution sites, i.e.,
22 supermarkets, being present in certain
23 low-income areas, or lack thereof.

1 So I'll stick with those big three.

2 Q. And then as far as particular needs
3 of the minority community in Georgia, it
4 would be fair to characterize that as similar
5 to what you just described, so, you know, two
6 sides of the same coin.

7 Would that be fair to say?

8 A. Could you specify exactly what --

9 Q. Sorry. Yeah. My phrasing was a
10 little poor.

11 So the question you just answered
12 was based on the needs differing from those
13 of white residents, and now I'm just asking
14 needs of the minority community generally.

15 A. Yes. Well, to be more specific with
16 your question, if I understand what you're
17 saying, because there -- I'm just using
18 Georgia -- as you said, there are certain
19 districts in Georgia that are poor white that
20 have that access, i.e., Marjorie Taylor
21 Green's district.

22 So I can only speak for those
23 districts in or around the metro Atlanta area

1 that I know. There are some food deserts,
2 health care is an issue, and definitely
3 education.

4 Q. And as far as those needs that
5 you've identified, what do you base that --
6 those specific needs on? Has it been
7 personal experience that you have or
8 anecdotal experience or reading about it?
9 What do you base those needs on?

10 A. I would say two-fold. Maybe the
11 Atlanta Journal-Constitution and its coverage
12 of -- of some of the needs and the minorities
13 and my own personal experience as I volunteer
14 to pass out baskets with the fraternity to
15 give away scholarships, et cetera.

16 MR. WEIGEL: All right. Well,
17 Mr. Woods, that -- I'm fairly certain that
18 that completes my questioning for now.

19 Counsel, I didn't know if you had
20 any questions you wanted to get on the record
21 for Mr. Woods or if you needed a break to
22 kind of go through everything, so just let me
23 know what works best for you.